

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

MAY 08 2017

SC Court of Appeals

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Court Case No. 2016-2339
Case No.: 2014-CP-08-2424

Patricia Damico, and Lenna Lucas, Individually and on behalf of others similarly situated, Joshua and Brittany Beutow, Edward and Sylvia Dengg, Jonathan and Theresa Douglass, Anthony and Stacey Ray, Danny and Ellen Davis Morrow, Czara and Chad England, Bryan and Cynthia Camara, and Matthew Collins

Respondents,

v.

Lennar Carolinas, LLC, Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC, Paragon Site Constructors, Inc., Civil Site Environmental and Rick Bryant, Individually,

Of which Lennar Carolinas, LLC is

Appellant,

and

Of which Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC and Civil Site Environmental are

Respondents,

Lennar Carolinas, LLC,

Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometrics Consulting, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A Concrete, Inc., Knight's Concrete Products, Inc., Knight's Red-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Décor Corporation, DVS, Inc., Raul Martinez Masonry,

✓

LLC, Builders FirstSource-Southeast Group, LLC, and Lowcountry Renovations and Siding, LLP, Third-Party Defendants,

Of which Volkmar Consulting Services, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A Concrete, Inc., Knights Concrete Products, Inc., Knights Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Décor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders FirstSource Southeast Group, LLC, are

Respondents,

South Carolina Exteriors, LLC, Fourth-Party Plaintiff,

Respondent,

v.

Juan Garza Ramos d/b/a Juan Constructors, Fourth Party Defendants.

**RESPONDENT SOUTH CAROLINA EXTERIORS, LLC
MOTION FOR EXTENSION OF TIME**

Respondent, South Carolina Exteriors, LLC, by and through its undersigned counsel, with the consent of the Appellant, respectfully requests a thirty (30) day extension of time to file Respondent's Initial Brief and Designation of Matter for Record. The reason for this request is the time has not expired for South Carolina Exteriors, LLC to file and serve its Initial Brief and Designation of Matters, and South Carolina Exteriors, LLC does not request this extension of time for impermissible delay but to serve the interest of justice by permitting counsel for South Carolina Exteriors, LLC adequate time to prepare its Initial Brief and Designation of Matters. Additionally, counsel for other Respondents have also requested an extension and the undersigned anticipates joining in their arguments.

For the above-stated reasons, on behalf of Respondent, South Carolina Exteriors, LLC, I respectfully request the Court grant South Carolina Exteriors, LLC a thirty (30) day extension of

time. If this Motion is granted, South Carolina Exteriors, LLC's Initial Brief will be due on or before June 5, 2017. This is movant's first request for an extension of this deadline.

Respectfully Submitted,

BEST HONEYCUTT, P.A.

By: _____


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***Attorneys Respondent for South Carolina
Exteriors, LLC***

May 4, 2017
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
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Respondents,

South Carolina Exteriors, LLC, Fourth-Party Plaintiff,

Respondent,

v.

Juan Garza Ramos d/b/a Juan Constructors, Fourth Party Defendants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel with a copy of the Motion for Extension of Time by mailing copies of same by United States Mail with first class postage to the following address:

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May 4th, 2017
Charleston, South Carolina



BEST HONEYCUTT, PA
ATTORNEYS AT LAW

May 4, 2017

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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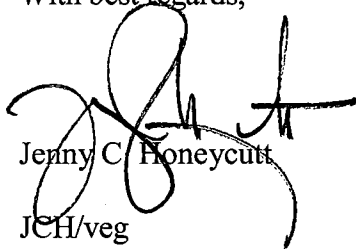
Re: Patricia Damico, et al. v Lennar Carolinas, LLC, et al.
Case No.: 2014-CP-08-02424
Appellate Case No.: 2016-2339
BH File No.: 0001-100

Dear Ms. Kitchings:

Please find enclosed for filing with the Court the original and seven (7) copies of Respondent South Carolina Exteriors, LLC's Motion for Extension in connection with the above referenced matter. I have also enclosed proof of service on counsel for Appellant and our firm check in the amount of \$25.00 for the filing fee for this motion. Please return the additional filed copy to us in the enclosed, self-addressed, stamped envelope provided.

Should you have any questions, please feel free to contact me or my paralegal, Vicky E. Garner.

With best regards,



Jenny C. Honeycutt

JCH/veg
Enclosures

cc: To all Other Counsel of Record (w/enc.)



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